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Services LLC*

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**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA  
FRESNO DIVISION**

HEATHER BOONE and ROXANNE  
RIVERA, on behalf of themselves and all  
others similarly situated,

Plaintiffs,

CRISTIAN BARRERA, individually,

Plaintiff,

v.

AMAZON.COM SERVICES, LLC,

Defendant.

Case: 1:21-CV-0241-KES-BAM-LEAD

Case: 1:22-CV-0146-KES-BAM-  
MEMBER

**JOINT STIPULATION FOR  
CLARIFICATION OF FINAL  
APPROVAL ORDER AND  
~~PROPOSED~~ ORDER**

Complaint Filed: Feb. 23, 2021  
Trial Date: None

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6 *Attorneys for Plaintiff Barrera*

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1 IT IS HEREBY STIPULATED by and between Plaintiffs Heather Boone, Roxanne Rivera,  
2 and Christian Barrera (“Plaintiffs”), by and through their counsel of record, and Defendant  
3 Amazon.com Services, LLC (“Defendant”), by and through its counsel of record, as follows:

4 WHEREAS, this Court issued an order granting final settlement approval on November 7,  
5 2024 (Dkt. 115) (the “Order”);

6 WHEREAS, Paragraph 11 of the “Conclusion and Order” section of the Order states that  
7 \$7,500.00 of the PAGA award shall be paid by the settlement administrator directly to California’s  
8 Labor and Workforce Development Agency (“LWDA”);

9 WHEREAS, the Parties’ settlement agreement provides that \$75,000.00 of the PAGA  
10 award shall be paid to the LWDA and Plaintiffs had sought for \$75,000 to be paid to the LWDA,  
11 *see* Order at 5;

12 WHEREAS, after the deadline to submit exclusion requests, the settlement administrator  
13 received a request from one Class Member to exclude themselves from the settlement, and the  
14 submission indicated that the Class Member had attempted to submit the request before the  
15 deadline;

16 WHEREAS, accepting the one additional exclusion request would increase the total number  
17 of exclusions/opt-outs from 16 to 17, out of 249,598 Class Members;

18 WHEREAS, the Parties believe that accepting the one additional request for exclusion has  
19 no material impact on this case or the appropriateness of the settlement; and

20 NOW THEREFORE, the Parties stipulate, agree, and respectfully request that the Court  
21 clarify: (1) that the settlement administrator shall pay \$75,000.00 of the PAGA award directly to  
22 the LWDA; and (2) the total number of exclusions from the Class is 17.

1 Respectfully submitted,

2  
3 Dated: November 15, 2024

Hodges & Foty, LLP

4  
5 By: /s/ Don J. Foty

6 Don J. Foty  
Attorneys for Plaintiffs Heather Boone and  
Roxanne Rivera

7  
8 Dated: November 15, 2024

The Nourmand Law Firm, APC

9  
10 By: /s/ James A. De Sario

11 James A. De Sario  
Attorneys for Plaintiff Cristian Barrera

12  
13 Dated: November 15, 2024

Gibson, Dunn & Crutcher LLP

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15 By: /s/ Bradley J. Hamburger

16 Bradley J. Hamburger  
Attorneys for Defendant

**ORDER**

Pursuant to the Parties' Joint Stipulation for Clarification of Final Order,

IT IS SO ORDERED: (1) that Paragraph 11 of the "Conclusion and Order" section of the Court's Order Granting Plaintiffs' Motion for Final Approval of Class Action Settlement is revised to direct the settlement administrator to pay \$75,000.00 of the PGA award directly to California's Labor and Workforce Development Agency; and (2) that 17 individuals have been excluded from the Class.

IT IS SO ORDERED.

Dated: November 18, 2024

/s/ Barbara A. McAuliffe  
UNITED STATES MAGISTRATE JUDGE